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April 23, 2020

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write jointly with the Government (AUSA Tanya Hajjar), to respectfully request that this Court adjourn the schedule for the sentencing memoranda, Fatico hearing and sentencing hearing for Keith Raniere. Currently, the defendant's sentencing memorandum is due on April 27, 2020; the Government's sentencing memorandum is due on May 4, 2020; a Fatico hearing, if necessary, will be held on May 18, 2020 and the defendant's sentencing hearing will be held on May 21, 2020. (See March 18, 2020 Order.)

Counsel visits at the MDC Brooklyn are still not permitted. Legal telephone calls with our client are limited to 15 minutes each. Moreover, Governor Cuomo has extended the date for non-essential businesses to stay closed and for work from home to continue to May 15, 2020. The Governor continues to discourage non-essential travel.

We therefore request that the Court modify the sentencing schedule as follows: defendant's sentencing memorandum shall be due on June 1, 2020; Government's sentencing memorandum shall be due June 8, 2020. We request that the Court adjourn the date for the Fatico hearing, if necessary, and the sentencing hearing to a date convenient for the Court.

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Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marc A. Agnifilo, Esq., *Of Counsel*
Teny R. Geragos, Esq.

cc: Counsel for the government (via ECF)